ACCESS 4 ALL, INC., A FLORIDA NOT FOR PROFIT CORPORATION AND FELIX ESPOSITO, INDIVIDUALLY,

LIMITED LIABILITY COMPANY,

PLAINTIFFS,

V.

GSH LODGING, LLC, A DELAWARE

DEFENDANT.

CIVIL ACTION NO. 04-12238 JLT

ASSENTED TO MOTION FOR LEAVE TO APPEAR PRO HAC VICE

The undersigned, local counsel for GSH Lodging, LLC ("Defendant"), a member of the bar of this Court, hereby requests, pursuant to Local Rule 83.5.3, that Timothy J. Grande be permitted to appear as counsel for Defendant and practice in this Court pro hac vice.

As grounds therefore, local counsel states as follows:

- 1. Mr. Grande has a prior attorney/client relationship with Defendant.
- As set forth in the attached Certificate, Mr. Grande meets the 2. requirements for admission pro hac vice in this action.
 - 3. Plaintiffs' counsel has assented to this motion.

WHEREFORE, GSH Lodging, LLC respectfully requests that an Order be entered permitting Timothy J. Grande to appear *pro hac vice* on behalf of GSH Lodging, LLC in this action.

Assented to:

ACCESS 4 ALL, INC., and, FELIX ESPOSITO,

By their attorneys,

O. Oliver Wragg, IV, Esq. Fuller, Fuller & Associates, PA 12000 Biscayne Blvd., Suite 609 North Miami, Florida 33181 Telephone: (305) 891-5199

January 19, 2005

Respectfully submitted,

GSH LODGING, LLC,

By its attorneys,

David S. Rosenthal (BBO# 429260)

NIXON PEABODY LLP

101 Federal Street

Boston, MA 02110-1832

(617) 345-1300

LR 7.1 CERTIFICATION

I hereby certify that counsel for the parties have conferred in good faith and Plaintiffs' counsel has agreed to assent to this motion.

David S. Rosenthal

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record of each party by first class mail on January 19, 2005.

David S. Rosenthal

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